

## **REMARKS**

### **1. Status**

Applicant respectfully requests favorable reconsideration of this application, as currently amended, in light of the following remarks.

In the outstanding Office Action, claims 11 and 12 were rejected under 35 U.S.C. § 102(b) as being anticipated by Grimmer et al. (U.S. Patent No. 3,100,452, "Grimmer"); claims 23, 25, 27, and 28 were rejected under 35 U.S.C. § 102(b) as being anticipated by Davis (U.S. Patent No. 4,735,402); and claims 13-22, 24, 26, 29, and 30 were indicated as being allowable if rewritten in independent form. Applicant appreciatively acknowledges the indication of allowable subject matter in the claims.

In this reply, Applicant adds new claims 31 and 32. The additions to the claims are supported by the originally-filed application. No new matter has been added.

### **2. Reply to the § 102(b) Rejection of Claims 11 and 12 Based on Grimmer**

Applicant respectfully requests favorable reconsideration of the rejection of claims 11 and 12 based on Grimmer for the reasons set forth below.

The Examiner asserts that Grimmer's annular latching flange 20 constitutes "a brake nose arranged at a leading tip of the tool string," as recited in independent claim 11. Applicant respectfully disagrees. Grimmer does disclose "a latching notch or groove 31 . . . which engages the latching flange 20 of the gas lift valve to lock the gas lift valve to the latch means" (c. 3, ll. 28-30). However, as illustrated in Figs. 1-3, Grimmer's locking device is arranged laterally alongside Grimmer's shifting tool 40, and is not "arranged at a leading tip of the tool string."

Therefore, Applicant submits that Grimmer fails to teach or suggest at least "a brake nose arranged at a leading tip of the tool string," as recited in independent claim

11. Accordingly, Applicant respectfully requests favorable reconsideration of the rejection of independent claim 11 and its dependent claim 12 based on Grimmer.

In addition, Applicant adds new claim 31, which further specifies that “the brake nose and the leading tip are arranged along a common axis.” Claim 31 finds non-limiting support at least in Fig. 1 of the originally-filed application, and is believed to be allowable at least for the reasons set forth above because it depends from claim 11.

**3. Reply to the § 102(b) Rejection of Claims 23, 25, 27, and 28 Based on Davis**

Applicant respectfully requests favorable reconsideration of the rejection of claims 23, 25, 27, and 28 based on Davis for the reasons set forth below.

The Examiner asserts that Davis’s suspension strut 238 constitutes a “tool string,” as recited in independent claims 23 and 27. Applicant respectfully disagrees. Nothing in the record suggests that the claim terms should be given a meaning other than their ordinary meanings in the art. To that effect, Applicant submits that a person of ordinary skill in the art would not construe Davis’s suspension strut 238 as constituting a “tool string” because Davis relates to the field of vehicle suspension systems (c. 1, l. 14), which is unrelated to that of long tools in petroleum wells (see p. 1, ll. 2-6, of Applicant’s specification).

The Examiner also asserts that the top and bottom portions of Davis’s piston 262, which has grooves 270, constitute “a brake spindle comprising first and second braking sections,” as recited in independent claim 23. Applicant respectfully disagrees. A person of ordinary skill in the art would find that an uninterrupted sequence of grooves constitutes at best a single braking section, so that Davis’s piston does not constitute distinct braking sections but a single braking section. Applicant further submits, in this

regard, that there would be not objective way to divide the piston and that the express use in Davis of a single numerical reference to designate the piston 262 is inconsistent with the proposition that it represents distinct braking sections.

Therefore, Applicant submits that Grimmer fails to teach or suggest at least a “tool string,” as recited in independent claims 23 and 27, and “a brake spindle comprising first and second braking sections,” as recited in independent claim 23. Accordingly, Applicant respectfully requests favorable reconsideration of the rejection of independent claims 23 and 27 and their dependent claims 25 and 28 based on Davis.

In addition, Applicant submits, for the same reasons discussed above regarding independent claim 23, that Davis does not teach or suggest that “the brake spindle comprises a plurality of labyrinths configured to reduce a velocity of the tool string,” as recited in dependent claim 28.

Applicant also adds new claim 32, which further specifies that “the first and second braking sections are separated by a non-braking section.” Claim 32 finds non-limiting support at least in Fig. 1 of the originally-filed application, and is believed to be allowable at least for the reasons set forth above because it depends from claim 23.

#### **4. Concluding Remarks:**

In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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